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Department of
Agriculture

Food and
Consumer
Service

Mountain
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Reply to
Attn. of: SP 97-03

Subject: School Meals Initiative (SMI) Policy Guidance - Questions and Answers

To: STATE AGENCY DIRECTORS (Child Nutrition Programs) -Colorado ED, Iowa, Kansas, Missouri ED,
Montana OPI, Nebraska ED, North Dakota,
South Dakota, Utah, Wyoming

This memorandum provides policy guidance on a variety of SMI related issues. Attached is the second set of answers to questions which have been addressed by the Food and Consumer Service (FCS) in our National Office. Several questions concerning SMI monitoring issues will be addressed in subsequent guidance to be issued by FCS in the near future. Please contact the Special Projects Section if you have questions regarding this guidance.

Darlene Sanchez

for ANN C. DEGROAT
Regional Director
Child Nutrition Programs

Attachment

SCHOOL MEALS INITIATIVE FOR HEALTHY CHILDREN

QUESTIONS AND ANSWERS

SET NUMBER TWO

General

1. Will guidance on the special circumstances in RCCIs be issued.

We will try to provide guidance on specific circumstances as they become known to us.

2. Will USDA provide nutrition standards that go beyond age 17? For the purposes of the CACFP, nutrition standards for adults over 51 are provided in the training manual. For age groups not provided, the appropriate RDA could be divided by one-third and one-fourth, respectively, for the NSLP and SBP.

The Department has no plans to issue nutrition standards for persons over 17. Because of the limited number of older students attending high school, there would be little practical value in attempting to apply a different set of standards in a normal school setting. Moreover, while residents of RCCIs may often be older than 17, the RDA and calorie requirements for this population do not, in fact, differ substantially from those set for 17 year olds. Therefore, the requirements for the 14 - 17 age group should be applied to persons over age 17.

3. Will USDA provide guidance on the selection of a menu planning method? Will a video be produced on this subject? What other actions or materials does USDA plan to develop in the future?

We have already provided basic information on NuMenus, Assisted NuMenus and the enhanced food-based meal planning system, including information about the advantages and potential drawbacks of each. We are also in the process of developing guidance specific to the traditional meal pattern. If schools believe they need additional assistance with deciding which alternative to use, they should contact their State agency.

The Department has also provided other guidance materials to State agencies and schools, and additional materials will be developed in the near future. Schools have already received a Tool Kit for Healthy School Meals, which includes new recipes designed to comply with the Dietary Guidelines, and the Department has provided States with a menu cycle that can be used as a model for those that choose Assisted NuMenus. A menu planner which serves as a companion to the

training manual for locals is under development, and we expect to have a revised Food Buying Guide available for School Year 1998/1999. The Department is also planning to revise the Meal Pattern Requirements and Offer Versus Serve Manual to reflect the updated nutrition requirements and clarify the menu planning options available to local schools. We are considering the development of a new video as part of that package.

4. Must schools using a food-based menu planning system comply with the nutrient standards, including the Dietary Guidelines?

The law clearly requires all schools to serve meals meeting all of the nutrition standards by the school year beginning July 1, 1996, unless a waiver not exceeding two years has been authorized by the State agency. This statutory requirement applies to all schools regardless of the meal planning method they have chosen.

5. Do the provisions for children with special dietary needs apply to the new meal planning methods?

Yes. Schools are still required to make appropriate accommodations for children whose disabilities prevent them from eating the regular meal, and the Department continues to encourage schools to make accommodations for children who are not disabled but have special dietary needs. If the accommodation does not require substituting food items (e.g., blenderized meals), those meals would be included in the nutrient analysis. If a substitution is involved, those meals would not be included in the analysis.

6. May a school use different menu planning approaches for lunch and breakfast?

Yes.

Nutrient Analysis

7. How are salad and other specialty food bars incorporated into the nutrient analysis?

Standardized recipes are developed for salad bars and other specialty food bars and are entered into the data base at the local level. Recipes include the amounts of all ingredients available at the bar and the estimated number of portions served as part of the reimbursable meal service, as is the case with any other recipe. Guidance on treating theme bars is provided on pages 3-19, 3-20, 3-21 and 9-5 of the Healthy School Meals Training Manual.

8. Must all menu items or foods offered as part of a reimbursable meal (and therefore included in the nutrient analysis) be offered before the point of service?

All menu items planned as part of a reimbursable meal need to be available before the point of service to ensure that the cashier can determine that a reimbursable meal has been taken. However, schools may offer certain extra items which have no direct bearing on the eligibility of the meal for reimbursement but would be counted in the nutrient analysis even when they are placed beyond the point of service. For example, it may be more efficient to place condiments beyond the point of service. Another example would be a free salad bar available to all children in the cafeteria regardless of whether or not they received a reimbursable meal. In these situations, the amount of food taken by children who also received reimbursable meals would be estimated and included in the nutrient analysis. Schools electing to use one of the food-based systems will need to include estimates of these items on their production records so that the State agency can count them as part of its nutrient analysis of the food service.

9. What is the status of the National Nutrient Database?

The Department intends to issue an update for commodities and other foods already incorporated into the data base by January 1997. We are proceeding with a contract to input information on processed foods, and we expect that the first of this new information will be available no later than July 1997.

10. Why are a la carte meals excluded from the nutrient analysis?

Except for prohibiting the sale of foods of minimal nutritional value, the Department does not regulate the school food service's sale of competitive foods. Moreover, while every reimbursable meal must provide a minimum number of menu or food items, there is no similar consistency among a la carte sales. A child could take one item or several, and the item(s) could either supplement the reimbursable meal or replace it. Finally, as a practical matter, the analysis of the reimbursable meal service is possible because schools must make accurate meal counts of reimbursable meals at the point of service. There is no similar mechanism for the a la carte service. For these reasons, it is not appropriate to include a la carte items in the nutrient analysis.

11. How does the unit price requirement mesh with offer-versus-serve under NuMenus and Assisted NuMenus?

The requirement to price the reimbursable meal as a unit does not differ substantially from one meal planning option to another. Under the food-based alternatives, the meal planner must satisfy specific component/quantity requirements, while meal planners using NuMenus and Assisted NuMenus determine for themselves what constitutes the meal, as long as an entree, milk and at least one other menu item are planned at a minimum. Under all systems, the child then must be offered a complete meal and must take the minimum number of items. In the event that multiple choices of some components are available (e.g., more than one entree or several types of fruits/vegetables when only two are planned as part of the meal) the meal planner must convey to the child and the cashiers what needs to be taken.

12. Will there be more guidance on using an unweighted nutrient analysis?

As Secretary Glickman's letter indicated, schools are authorized to conduct unweighted nutrient analyses temporarily while the Department evaluates whether or not unweighted analyses reflect the nutrient content of meals as accurately as weighted analyses do. During this interim period, we believe the guidance on simple, unweighted averages that is in the training manual is sufficient. If the evaluation indicates that unweighted averages should be authorized permanently, we will consider developing more extensive guidance.

13. May schools use an alternative to the approved software?

The regulation makes it quite clear that NuMenus and Assisted NuMenus must be conducted using software approved by the Department. Unless approved software is used, there is no guarantee that the analysis will yield an accurate analysis. Schools using a food-based system may, of course, use an unapproved package as a tool to judge their compliance with the nutrition standards. These schools should be cautioned, however, that the State agency will use approved software when it conducts its own nutrient analysis, and the State's results may differ substantially from the school's own.

14. Under NuMenus, is it acceptable for a student to take the entree and one other item if the planned meal includes the entree, milk and three additional menu items?

No. When more than three items are included in the meal, the child may not decline more than two items. In this example, therefore, the child must take the entree and at least two other menu items.

15. What is needed for production records under NuMenus?

The computer printout generated in the course of planning the meal service will generally be the production record.

Offer Versus Serve, Grains/Breads, Crediting

16. How will students know which menu items and/or foods they have to take to have a reimbursable meal?

Schools which elect to continue using the traditional meal pattern will not need to change the ways they have taught children about reimbursable meals in the past, and schools deciding to use the enhanced food-based system will experience little, if any, change apart from minor modifications to encourage consumption of additional fruit/vegetable and grain/bread items. We recognize that schools which depart from the strict component/quantity requirements of the past by using NuMenus and Assisted NuMenus may need to alter their methods somewhat, especially if they offer extensive choices. Even in these instances, though, children will learn quickly that they must take an entree, and information about other menu items can be conveyed visually through the use of menu boards and placards. We are planning to revise our guidance on meal requirements and offer versus serve to reflect the new array of options available to schools, and we will consider including examples of effective teaching techniques. It is also important to note that even under NuMenus, most meals are likely to be designed around the concept of four components and five items. Therefore, there should be few problems explaining the requirements of offer-versus-serve.

17. Does the Grain/Bread Instruction apply to NuMenus and Assisted NuMenus?

No, because there are no specific component/quantity requirements under Numenus or Assisted NuMenus.

18. Do crediting policies apply to NuMenus and Assisted NuMenus?

No, for the same reason.

19. Does the new Grain/Bread Instruction apply to both food-based menu planning systems?

The basic crediting policies apply to both systems; however, the authority to credit one dessert per day as a bread item applies only to the enhanced food-based system.

20. Can a grain/bread item be served and credited as a dessert in the School Breakfast Program?

Certain pastries, such as doughnuts, have traditionally been credited for school breakfasts, and they continue to be creditable under the current instruction as long as they equal a serving as defined in the instruction.

21. Is juice still limited to contributing no more than one-half of the vegetable/fruit component?

Yes. There have been no changes to the crediting policies covering fruits and vegetables.

Monitoring/Accountability

22. How will States get the nutrient information they need to perform the analysis of menus used by schools electing to use one of the food-based menu planning systems?

Much of the information necessary to conduct a nutrient analysis will be loaded into the approved software States will use. The National Nutrient Database will include all USDA commodities, standard reference food items used in the school lunch and breakfast programs, the quantity recipes developed by the Department and a wide range of processed foods. To ensure that detailed information on processed foods is available, the Department is working with the food industry to facilitate the submission of this data. Since schools may use processed foods that are not included in the database, States should direct schools to maintain the brand name of the product and the nutrient information provided on the label as part of their production records.

23. The regulation authorizes schools to devise their own system for ensuring the accuracy of meal counts in lieu of the edit checks specified in the regulations provided the State agency has identified no counting and claiming violations in its most recent administrative review. For purposes of this provision, what does the Department consider to be "no counting and claiming violations"? Is there a tolerance?

Essentially, a school would be considered to have no counting and claiming violations if a system of edit checks is in place and is being properly used and the State agency did not identify a violation of Performance Standard One that the edit check could have revealed. For example, if a clerk accidentally entered an incorrect number during recording and the error would not have been picked up by the edit check, the school could be authorized to develop its own internal control. However, if there is no edit check in place or the school is not using it properly, the school cannot be authorized to depart from the regulatory edit check. Tolerances are not authorized by the regulations.